

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

WILLIAM C. BOND,

*

Plaintiff

*

v.

*

Case No.: MJG-01-CV-2600

*

KENNETH BLUM, SR., ET AL.,

*

Defendants

*

* * * * *

**DEFENDANTS' OPPOSITION TO WILLIAM BOND'S MOTION
FOR PERMANENT INJUNCTION AND RESTRAINING ORDER**

Defendants, Adelberg, Rudow, Dorf & Hendler, LLC ("Adelberg Rudow"), Kenneth Blum, Sr., Kenneth Blum, Jr., Dudley F. B. Hodgson, and McDaniel, Bennett & Griffin, by their undersigned attorneys, hereby file this Opposition to William Bond's Motion for Temporary Restraining Order ("Motion"), and for cause state:

Background

1. The above-captioned action was filed on August 29, 2001 by Bond and on November 27, 2001, the Court entered judgment in favor of all Defendants and dismissed all of Bond's claims with prejudice.

2. On January 4, 2002, the Court denied Bond's Motion to Alter or Amend Judgment.

3. On January 31, 2002, Bond filed a Notice of Appeal.

4. On January 24, 2003, the Court of Appeals for the Fourth Circuit affirmed this court's judgment in favor of all defendants. *Bond v. Blum*, 317 F.3d 385 (4th Cir. 2003), *cert. denied*, 540 U.S. 820 (2003).

5. On or about May 6, 2003, this Honorable Court granted Adelberg Rudow a judgment against Bond in the amount of \$69,350.44 and McDaniel Bennett and Griffin a judgment in the amount of \$83,667.65 for attorneys' fees arising out of Bond's prosecution of this frivolous copyright infringement case against Adelberg Rudow and others. Bond subsequently appealed this judgment for attorneys' fees to the United States Court of Appeals for the Fourth Circuit, which affirmed the District Court.

6. According to the Docket Report for this action, the case terminated on May 6, 2003.

7. Since that time, all papers filed in this action have related either to various Defendants' claims for attorneys' fees or writs of garnishment filed against Bond.¹

Argument

8. Bond's Motion is untimely and without any merit. Bond fails to appreciate that his claims were ruled upon and affirmed on appeal several years ago. The current crop of motions is simply the continuation of his baseless and vexatious litigation against these Defendants.

9. Defendants hereby adopt and incorporate their responses to Bond's motions for reconsideration pursuant to Federal Rule of Civil Procedure 60(b), recusal (which this Court has already denied), and for temporary restraining order and preliminary injunction.

10. By his Motion, Bond essentially requests that the Court order all copies of the manuscript in the copyright case returned to the Court and for those people who supplied copies of the manuscript in any litigation to account under oath for all disseminations.

¹ As the Court is aware, Bond has filed multiple actions against these parties, all of which have proved without merit. Indeed, Adelberg Rudow and co-Defendant McDaniel Bennett & Griffin are now defending an appeal in the United States Court of Appeals for the Fourth Circuit of this Court's ruling filed by Bond's counsel over approximately \$15,000 in counsel fees. Bond has filed various state court actions as well, all of which have been unsuccessful against Adelberg, Rudow and co-Defendant McDaniel Bennett & Griffin.

11. In support, Bond refers to a 2001 *Washington Post* article and previously filed pleadings. Bond then makes the Herculean leap that Defendants attempted to pollute the jury pool and influence judges. It is unclear exactly what any of these allegations have to do with the now closed copyright action and/or how they afford Bond any relief at this late time. These issues were raised and resolved against Bond years ago.

12. The relief Bond now requests would constitute an impermissible collateral attack on this Court's previous judgment. Moreover, the statute of limitations for any claims relating to the manuscripts has long since expired.

13. Finally, this action was closed several years ago. There is no pending case pursuant to which Bond could seek any relief whatsoever. Bond should have filed any request for relief during the pendency of the copyright action while he was represented by counsel. His Motion is untimely, moot and without basis. Bond's Motion should be denied.

WHEREFORE, Defendants hereby request that this Honorable Court deny William Bond's Motion for Permanent Injunction, and award all further relief this Court deems appropriate.

Respectfully submitted,

_____/s/_____
Andrew Radding (Bar No. 00195)
Michael R. Severino (Bar No. 025204)
Adelberg, Rudow, Dorf & Hendler, LLC
600 Mercantile Bank & Trust Building
2 Hopkins Plaza
Baltimore, Maryland 21201
(410) 539-5195

Counsel for Adelberg, Rudow, Dorf & Hendler, LLC

/s/

William F. Ryan, Jr., Esquire
Amy E. Askew, Esquire
Whiteford, Taylor & Preston L.L.P.
Seven Saint Paul Street
Baltimore, Maryland 21202-1626

Counsel for McDaniel Bennett & Griffin

/s/

Gerard P. Martin, Esquire
T. Christine Pham, Esquire
Rosenberg | Martin | Greenberg, LLP
25 South Charles Street
Suite 2115
Baltimore, Maryland 21201

Counsel for Kenneth Blum, Sr., et al.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on this 11th day of May, 2007, a copy of the foregoing Opposition to the Motion for Permanent Injunction was served by first class mail on the following:

William C. Bond
309 Suffolk Road
Baltimore, Maryland 21218

William F. Ryan, Jr., Esquire
Amy E. Askew, Esquire
Whiteford, Taylor & Preston L.L.P.
Seven Saint Paul Street
Baltimore, Maryland 21202-1626

Gerard P. Martin, Esquire
T. Christine Pham, Esquire
Rosenberg | Martin | Greenberg, LLP
25 South Charles Street
Suite 2115
Baltimore, Maryland 21201

_____/s/_____
Michael R. Severino

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

WILLIAM C. BOND,

*

Plaintiff

*

v.

*

Case No.: MJG-01-CV-2600

*

KENNETH BLUM, SR., ET AL.,

*

Defendants

*

* * * * *

**ORDER DENYING MOTION FOR PERMANENT
INJUNCTION AND RESTRAINING ORDER**

Upon consideration of the Motion for Permanent Injunction and Restraining Order filed by William Bond, and the Opposition thereto filed by Defendants, it is this ____ day of _____, 2007,

ORDERED, that the Motion for Permanent Injunction and Restraining Order shall be and is hereby DENIED.

Judge
United States District Court
for the District of Maryland